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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

THE UNITED STATES OF AMERICA,

Plaintiff,

vs.

TIFFANY BAUTISTA,

Defendant.

CASE NO. 2:10-CR-307-LDG-RJJ

**MOTION TO EXTEND THE DATE FOR
SELF-SURRENDER**

(Expedited Treatment Request)

COMES NOW, Tiffany Bautista, Defendant herein, by and through her respective counsel Michael V. Cristalli, Esq., of Gordon Silver, and respectfully moves this Honorable Court to allow a brief extension of her self-surrender date.

This motion is based on the attached Memorandum of Points and Authorities and any evidence and/or argument that may be adduced should a hearing be required in this matter.

DATED this 9th day of May, 2013.

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/s/Michael V. Cristalli
MICHAEL V. CRISTALLI
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Attorney for Bautista

MEMORANDUM OF POINTS AND AUTHORITIES

That the undersigned counsel and the Government have entered into several stipulations to extend Ms. Bautista self- surrender date for the purpose of testifying in several cases. Ms. Bautista was scheduled to testify in the matter of *United States of America v. Michael Shomer*, case number: 2:10-CR-493-JCM-VCF. Trial in this matter had been pushed out several times and was scheduled to go forward on March 25, 2013. However, the undersigned counsel learned for the Government that Mr. Shomer had missed his court date and absconded to Europe and as such, Ms. Bautista's testimony would no longer be needed.

Ms. Bautista is currently scheduled to self-surrender May 28, 2013, and would like to request an extension of her self-surrender date until after July 9, 2013. She would like an opportunity to attend her son's graduation and prepare him for his first day of school. In addition she would like to use this time to put her finances and personal affairs in order and make sure her son is taken care of while she serves her time.

Ms. Bautista has been compliant with all of this Court's requirements since her sentencing.

CONCLUSION

Ms. Bautista has continued to be compliant with this Court's requirements and respectfully prays that this Honorable Court grant said motion to extend her self-surrender date.

Dated this 9th day of May, 2013.

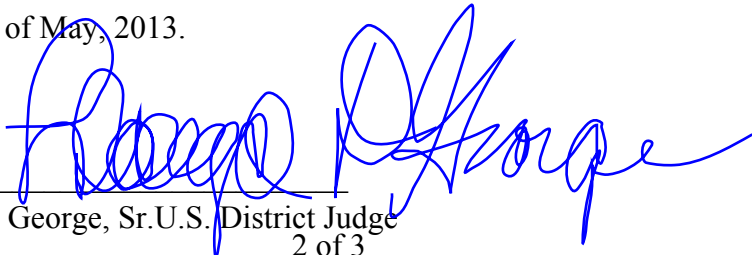
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ORDER

IT IS SO ORDERED that defendant's date to self-surrender is extended to Monday, July 15, 2013, at noon.

/s/Michael V. Cristalli
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3960 Howard Hughes Pkwy., 9th Floor
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Attorney for Bautista

DATED this 23 day of May, 2013.



Lloyd D. George, Sr. U.S. District Judge
2 of 3

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